

LAWRENCE A. ORGAN (SBN 175503)
NAVRUZ AVLONI (SBN 279556)
CALIFORNIA CIVIL RIGHTS LAW GROUP
332 San Anselmo Ave.
San Anselmo, California, 94960
Telephone: (415) 453-4740
Facsimile: (415) 785-7352
larry@civilrightsca.com
navruz@civilrightsca.com

J. BERNARD ALEXANDER (SBN 128307)
ALEXANDER KRAKOW + GLICK LLP
1900 Avenue of the Stars, Suite 900
Los Angeles, California 90067
Telephone: (310) 394-0888
Facsimile: (310) 394-0811
balexander@akgllp.com

Attorneys for Plaintiffs
DEMETRIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;
CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES, INC.;
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**PLAINTIFFS' STATEMENT OF RECENT
DECISION IN SUPPORT OF THEIR
OPPOSITION TO DEFENDANT
CITISTIAFF SOLUTIONS, INC.'S
MOTION FOR SUMMARY JUDGMENT
OR, IN THE ALTERNATIVE FOR
SUMMARY ADJUDICATION OF ISSUES**

Date: October 23, 2019

Time: 2:00 p.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: March 2, 2020

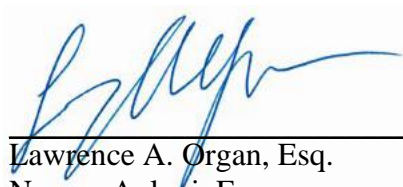
Complaint filed: October 16, 2017

In support of their Opposition to Defendant CitiStaff Solutions, Inc.'s Motion for Summary Judgment, or, in the Alternative, Summary Adjudication of Issues, and in accordance with Civil Local Rule 7-3(d)(2), Plaintiffs hereby submit the attached case. *Jimenez v. U.S. Continental Marketing, Inc.*, No. D075532, 2019 WL 5257938 (Cal. Ct. App. October 17, 2019). *Jimenez* was not published at the time Plaintiffs filed their Opposition. The holding of *Jimenez* is directly relevant to the analysis of joint employment and adverse employment actions within the context of temporary staffing companies.

CALIFORNIA CIVIL RIGHTS LAW GROUP

DATED: October 22, 2019

By:



Lawrence A. Organ, Esq.
Navruz Avloni, Esq.
Attorneys for Plaintiffs
DEMETRIC DI-AZ AND OWEN DIAZ